

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

TALIA N. HARRISON,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	Civil Action No.: 4:21-cv-00607
	:	
TYLER TECHNOLOGIES, INC.,	:	
	:	
Defendant.	:	
	:	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY

Plaintiff Talia N. Harrison, by and through undersigned counsel, moves to extend the deadline for Plaintiff to file her Reply to Defendant's Response to Plaintiff's Motion for Award of Attorney's Fees and Costs [Dkt. 47] through and including Thursday, March 20, 2023, showing the Court as follows:

1. This FLSA case was initiated on August 3, 2021. [Dkt. 1]
2. The parties reached an amicable resolution of this matter and filed their Joint Motion for Settlement Approval on February 27, 2023. [Dkt. 40]
3. On March 21, 2023, Plaintiff filed her Motion for Attorney Fees and Costs. [Dkt. 46]
4. On April 4, 2023, Defendant filed its Response to Plaintiff's Motion for Attorney Fees and Costs. [Dkt. 47]
5. Due to an inadvertent calendaring error, Plaintiff's counsel believed they had two (2) weeks (*i.e.* through April 18, 2023) to file their reply rather than one (1) week.
6. Plaintiff's counsel did not learn of this error until Mr. Herrington emailed Defendant's counsel yesterday, April 17, 2023, seeking a two (2) day extension of time through April 20, 2023.

7. This error arose from a relatively new legal assistant who was not aware that districts outside of Georgia had different deadlines for reply briefs. The ultimate responsibility for this error ultimately falls upon Plaintiff's Atlanta counsel, of course.
8. The undersigned counsel requests an extension of time for Plaintiff to file her Reply to Defendant's Response to Plaintiff's Motion for Award of Attorney's Fees and Costs through and including April 20, 2023.
9. Defendant has advised it will not oppose this Motion (see Certificate of Conference, below).
10. This request for extension is not being made for the purpose of delay, nor will the relief requested prejudice any party.
11. A proposed order is attached for the Court's convenience.

Respectfully submitted this 18th day of April 2023,

WAGE AND HOUR FIRM

s/ Melinda Arbuckle

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Counsel for Plaintiff

CERTIFICATE OF CONFERENCE

Counsel for Plaintiff conferred with counsel for Defendant regarding the relief requested in this Motion on April 17 and 18, 2023, via email. Counsel for Defendant state as follows:

Counsel for Defendant generally would not consent to a request for an extension as to a deadline that was already missed, but, under these circumstances and because the deadline was missed as a result of inadvertent error, Defendant does not oppose the filing of this motion.

s/ Melinda Arbuckle _____

Melinda Arbuckle

CERTIFICATE OF SERVICE

On April 18, 2023, I filed the foregoing document with the Clerk of Court using the CM/ECF system. I certify that all counsel of record were served electronically thereby.

s/ Melinda Arbuckle _____

Melinda Arbuckle